

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Yvonne L. Tines Jones,)
Plaintiff,) C.A. No. 05-10082-EFH
V.)
Norman Y. Mineta, Secretary,)
U.S. Department of Transportation; and)
U.S. Department of Transportation,)
Defendants.)

)

**JOINT MOTION FOR A FINAL CONTINUANCE
OF THE PRETRIAL CONFERENCE**

The parties to the above-captioned action, through counsel, hereby respectfully request that the Court continue the Final Pretrial Conference in this action as set forth below. As grounds for this motion, the parties state as follows:

1. This is an action by a former federal employee alleging discrimination in employment;
2. A final pretrial conference is scheduled in this action for February 4, 2008 at 11:00 a.m;
3. Defendant intends to file a dispositive motion in the case, which Defendant believes will dispose of most if not all of the claims in this action;
4. Plaintiff desires to take 3-4 depositions in this action, and Defendant desires to take one deposition, in order to complete discovery. The parties agree to engage in such discovery;
5. The parties submit that they will complete these depositions by March 14, 2008;
6. The defendant will file his dispositive motion on or before March 28, 2008;
7. The plaintiff will file his opposition by May 7, 2008; and

8. Should this case survive summary judgment, the parties would then be able to engage in settlement discussions.

In light of all of the above, the parties respectfully request that this motion be granted, and that the conference currently scheduled for February 4, 2008 at 11:00 a.m. be continued to a date after the Court decides the defendant's dispositive motion.

Plaintiff,

By her Attorney,

/s/Mitchell J. Notis

Mitchell J. Notis
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, Massachusetts 02445
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Defendant,

By his Attorney,

/s/ Rayford A. Farquhar

Rayford A. Farquhar
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3284

Local Rule 7.1 CERTIFICATION

The undersigned counsel certifies that she conferred with counsel for plaintiff and that he assents to the relief sought herein.

/s/Rayford A. Farquhar
Rayford A. Farquhar
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on January 24, 2007.

/s/ Rayford A. Farquhar
Rayford A. Farquhar
Assistant U.S. Attorney